

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

---

HERB CHAMBERS 1186, INC. d/b/a	)	
HERB CHAMBERS INFINITI OF BOSTON	)	
	)	
Plaintiff	)	Civil Action No. 1:13-CV-11798
v.	)	
	)	
DONALD A. SMITH, JR., PRESTIGE AUTO	)	
IMPORTS, INC. d/b/a WEBSTER AUTO SALES,	)	
and REZA PARINEJAD,	)	
	)	
	)	
Defendants	)	
	)	

---

**STATUS REPORT CONCERNING SETTLEMENT AND CLAIMS AGAINST SMITH**

In accordance with the Court's December 17, 2014 ECF Notice, the parties provide the following status report concerning settlement and claims against Defendant Donald A. Smith ("Smith").

1. Due to the terms of the settlement agreement reached between Plaintiff Herb Chambers 1186, Inc. d/b/a Herb Chambers Infiniti of Boston ("Chambers") and Defendants Prestige Auto Imports, Inc. d/b/a Webster Auto Sales and Reza Parinejad (the "Webster Defendants"), the undersigned parties request that this matter remain open until Jan. 30, 2015 to provide sufficient time to effectuate the terms of the settlement agreement, as requested in their previous Joint Status Reports.

2. Default has entered against Smith under Rule 55(a) with respect to the cross-claims asserted against him by the Webster Defendants. The Webster Defendants intend to file a motion for entry of default judgment against Smith accompanied by the Form of Default Judgment this week.

3. Within the next two weeks, Chambers and the Webster Defendants expect to file a stipulation of dismissal of Chambers' claims against the Webster Defendants.

4. The direct claims originally filed by Chambers against Smith will be resolved either by requesting dismissal or seeking default against Smith.

Respectfully submitted,

HERB CHAMBERS 1186, INC. d/b/a HERB  
CHAMBERS INFINITI OF BOSTON,

By its attorneys,

/s/ Ian J. Pinta

Howard M. Cooper (BBO #543842)  
hcooper@toddweld.com  
Ian J. Pinta (BBO #667812)  
ipinta@toddweld.com  
TODD & WELD LLP  
One Federal Street, 27<sup>th</sup> Floor  
Boston, MA 02110  
(617) 720-2626

DATED: January 15, 2015

REZA PARINEJAD AND PRESTIGE AUTO  
IMPORTS, INC.,

By their attorney,

/s/ Daniel J. Pasquarello

Daniel J. Pasquarello (BBO #647379)  
dpasquarello@pasqfinklaw.com  
PASQUARELLO | FINK LLC.  
185 Devonshire Street, Third Floor  
Boston, MA 02110  
(617) 963-0042

#### **CERTIFICATE OF SERVICE**

I certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing ("NEF") and paper copies will be sent to those indicated as non-registered participants.

/s/ Ian J. Pinta